

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
JUDGE WILLIAM H. ORRICK

CONFIDENTIAL JUROR QUESTIONNAIRE

INSTRUCTIONS TO JURORS

You must answer the attached juror questionnaire. The judge and lawyers will use the answers and other information to select a jury.

Write or print clearly. Answer all the questions to the best of your ability. You must not ask anyone for help. Do the best you can. There are no right or wrong answers. Correct answers are honest answers.

Truthful answers will ensure that we can select a fair and impartial jury in this case. Do not assume anything from the particular questions. The fact they are being asked does not necessarily have anything to do with the evidence that you will hear.

The judge and lawyers know that every person has beliefs and prejudices concerning many things. You should answer with your true feelings and opinion, whatever they may be. Do not assume that any of your answers will either qualify you or disqualify you from serving on this jury.

If you cannot answer a question because you do not understand it, write "Do Not Understand" in the margin next to the question. If you cannot answer because you do not know, write "Do Not Know" in the margin next to the question. If you want to explain your answer, do so briefly in the margin next to the question. If for any reason you do not want to answer any of the questions asked, please write the word "Private" next to the question, and we will take this matter up with you privately in person.

You understand the importance of juries to our American system of justice. We are confident that you will not try to avoid your duty as a citizen to serve as long as you are able. Without your help, our courts cannot operate properly under the Constitution.

An Explanation Sheet is attached to the questionnaire. Use it to answer questions more fully. Rather than leaving out information, please turn to the Explanation Sheet and add the Question Number and the remainder of your answer there.

Because your answers are part of the jury selection process and become part of the records of this court, your answers must be truthful, under penalty of perjury.

Only the attorney's and the Court will receive the answers to these questions. They will use them solely to select the jury in this case. The Court will maintain the confidentiality of your answers.

It is important that you not discuss the subject matter of the questions in this questionnaire with anyone else and that you not investigate on your own or with others what this case is about. While, of course, you can tell others that you have jury duty, please don't discuss the subject of the questions with anyone else. Do not read, watch, or listen to any news accounts about this matter, the trial, or anything associated with it. Do not research this matter on your own, on the internet or elsewhere.

Except for Lupe Mercado, the defendants in this case are charged with one common crime, a racketeering conspiracy. Each defendant is also separately charged in other counts of the Indictment.

To help you fill out this questionnaire, the Court is informing you that that Alfonzo Williams, Barry Gilton, Antonio Gilton, and Lupe Mercado are charged with a violent crime in aid of racketeering, specifically the murder of Calvin Snead, which allegedly happened on Le Conte Avenue in San Francisco, California, in June of 2012. For a short period, local papers reported about the death and some related matters. Paul Robeson is charged with encouraging, enticing, or coercing a minor for purposes of prostitution.

Judge William H. Orrick will be presiding over the trial of this matter. Assistant United States Attorneys William Frentzen, Damali Taylor, and Scott Joiner prosecute this case and represent the government. The defense lawyers are (1) John Grele for Alfonzo Williams, (2) Mark Goldrosen for Antonio Gilton, (3) Richard Tamor for Barry Gilton, (4) Tony Tamburello for Lupe Mercado, and (5) Winston Chan, Joseph Rose, and Cassandra Gaedt-Shceckter for Paul Robeson.

1. Full name: _____
2. In what city do you currently live? _____

- a. How long have you lived in that area? _____
- b. If less than 5 years, what city did you reside in previously? _____
- c. Do you own or rent your home? _____
- d. Have you ever lived in the Western Addition or Fillmore neighborhoods of San Francisco? _____

3. Age: _____

4. What level of school did you reach? List all degrees received.

5. What language(s) do you understand?

6. Can you do the following fluently in English?

a. Speak? Yes _____ No _____

b. Write? Yes _____ No _____

c. Read? Yes _____ No _____

7. Where do you work? (If retired or unemployed, where did you last work?)

8. What is your job description, or your job skills? _____

a. What did/do you like best about your job?

b. What did/do you like least about your job?

9. Please state any other jobs you have had in the last five years:

10. Do you have a spouse, partner, or significant other who lives with you? _____ If yes, what kind of work does he or she do?

11. If you have children, please state their ages and occupations, if any:

12. Have you ever served in the military? _____ If yes, state what branch and your dates of service.

13. Have you ever served on a jury? _____ If yes, please state the following:

a. approximate date of service _____

b. civil or criminal case ? _____

c. If it was a criminal case, what was the charge? _____

d. Was a verdict reached? _____

e. Is there anything from your prior jury service that would affect your ability to decide the issues in this case?

14. Have you ever served on a grand jury? _____ If yes, state when and where:

15. Have you, a member of your family, or a close friend ever been a plaintiff or defendant in a state or federal case? _____. If yes, please state:

a. What kind of case was it? _____

b. Is there anything about that case that would prevent you from being a fair and impartial juror in this case?

16. Have you, a member of your family, or a close friend ever been suspected of, accused of, investigated for, questioned in connection with, arrested for, or convicted of a crime?

_____ If yes, please state:

- a. What was the charge, and was it a felony or a misdemeanor?

- b. When and where did this occur?

- c. Was the crime gang-related? _____

- d. Was it a drug crime? _____

- e. Was it a sex-crime? _____

- f. Did the crime involve kidnapping? _____

- g. Did the crime involve sexual assault? _____

- h. Did the crime involve an individual under the age of eighteen? _____

- i. Did the crime involve the prostitution of an individual under the age of eighteen? _____

- j. If this charge or arrest involved you, were you represented by an attorney; was that attorney appointed by the court or privately retained by you; and did you have any problems or disagreements with your attorney?

- k. What law enforcement agency was involved in the charge?

l. Was there anything about the handling of that case that would make it difficult for you to sit as a juror in this case?

17. Have you, or has anyone in your family or a close personal friend, ever been a witness in a criminal case? _____ If so,

a. Did you (they) testify as a witness for the prosecution or the defendant?

b. What were the circumstances of the case? _____

c. Was the crime gang-related? _____

d. Did it involve a homicide?

e. Was it a drug crime? _____

f. Was it a sex-crime? _____

g. Did the crime involve kidnapping? _____

h. Did the crime involve sexual assault? _____

i. Did the crime involve an individual under the age of eighteen? _____

j. Did the crime involve the prostitution of an individual under the age of eighteen? _____

k. What was the final disposition of the case? _____

l. Was there anything about the handling of that case that would make it difficult for you to sit as a juror in this case?

18. Have you, or has anyone in your family or close personal friend, been a victim of a crime? _____ If so,

a. What were the circumstances of the case? _____

b. Was the crime gang-related? _____

c. Was it a homicide?

d. Was it a sex-crime? _____

e. Did the crime involve kidnapping? _____

f. Did the crime involve sexual assault? _____

g. Did the crime involve an individual under the age of eighteen? _____

h. Did the crime involve the prostitution of an individual under the age of eighteen? _____

i. What was the final disposition of the case? _____

j. Was there anything about the handling of that case that would make it difficult for you to sit as a juror in this case?

19. Do you believe that if the government charges someone and brings them to trial, they are more than likely guilty? _____

20. This case involves allegations that the defendants were members of a supposed gang known as Central Divisadero Playas/Central Divis Playas/CDP and that they conspired to commit and did commit various crimes, including murder, in San Francisco. These are only allegations at this point, and defendants are presumed to be innocent, unless the government proves the allegations beyond a reasonable doubt.

a. What have you heard, seen, or read about this or the alleged gang?

b. What does the word “gang” mean to you?

c. Do you believe that it is possible for someone to be a member of a “gang” and not be aware of, involved in, or approve of all of the criminal activity that others might engage in?

d. Do you believe it is possible for a person to have friends who are gang members but not themselves be gang members?

21. The allegations in this case against some of the accused involve possession or attempted possession of weapons. Do you have personal views or beliefs about firearms or the possession of firearms that would keep you from being fair and impartial?

Yes _____ No _____

If your answer is yes, please explain

22. Do you have any strong feelings or beliefs about pimping, the prostitution of minors and/or pimping of minors and the laws concerning the prostitution of minors and/or pimping of minors that would cause you to believe that you could not consider the evidence fairly, impartially, and according to the law? _____

23. Membership in an organization, group, or gang is not in itself a violation of law, and it is not a specific charge in this case. Regardless of the law, do you believe that an individual who is identified as a member of a gang, or associated with gang members, or is said to associate with gang members is necessarily and always guilty of criminal activity—regardless of what the evidence against that person may be.

Yes _____ No _____

please explain your views concerning the question asked.

24. Do you think you can be fair and impartial in a case involving street gang allegations, including murder and prostitution, and render a verdict based only on the evidence presented in court and according to the law given to you by Judge Orrick? _____

If you believe it will be difficult for you to be fair and impartial in this type of case, please explain why:

25. Do you have any strong feelings regarding the criminal justice system in the country including, but not limited to, your feelings about defendants, judges, the government and lawyers, that would prevent you from giving either the government or the defendant a fair hearing in this matter?

26. Is anyone in your family a law enforcement officer and/or are your close friends with any law enforcement officers? (This includes police, sheriff, FBI, highway patrol, District Attorney, Attorney General, United States Attorney, state prisons or county jails, Immigration and Naturalization Service, etc.)_____

If so, what agency do they work for?

27. If so, how to you know them? _____

28. Have you, a family member, or a friend ever served as, worked with, or know a police officer who was working or had worked in an undercover capacity? Please describe.

29. Do you harbor any ill feelings, for any reason, toward local, state or federal law enforcement agents?

30. Do you or anyone close to you have any formal education or training in law or law enforcement?

a. What does it consist of? _____

b. Will it make it difficult for you to fairly and impartially decide the facts of this case?

c. Do you feel you could put your personal experiences aside and decide this case solely on the facts and law as presented in this courtroom?

31. Would you believe the testimony of a law enforcement agent over that of another witness, simply because the witness is a law enforcement agent?

32. Has your life or the life of anyone close to you been affected by any gang activity?

a. If so, please explain: _____

33. Do you have any tattoos? (If so, please describe.)

a. What is your general opinion regarding people with tattoos? Please explain.

b. Do you believe that tattoos are often a sign of gang membership?

34. Do you have any opinion about crime, gangs, drugs, prostitution, pimping, prostitution of minors, pimping of minors, or violence – all of which are alleged in this case – that would interfere with your ability to be fair and impartial towards the accused ?

If so, please explain: _____

35. Do you have any experiences, views, or beliefs that would prevent you from being fair and impartial in a trial involving a person who may be from a different race or ethnic group than you are, including African-Americans?

Yes _____ No _____

If yes, please explain [if you want to answer this question privately, please indicate here:

36. What do you do in your spare time? _____

37. What newspaper and/or magazines do you read regularly? _____

38. If you watch television, what shows do you watch regularly? _____

39. What news programs do you watch regularly?

40. Do you ever use the Internet? _____

a. If so, how frequently? _____

b. What kind of content do you access online (e.g., news, games, social media, forums, etc.)?

c. Do you use the Internet to instant message others, and, if so, how frequently? _____

d. Have you ever used the Internet to meet people? Please explain. _____

e. Have you ever used online chat rooms? Please explain. _____

41. Do you use any form of social media? _____

a. Which social media platforms do you use? _____

b. How frequently do you use each platform (e.g., multiple times per hour, hourly, daily, weekly, etc.)? _____

c. Do you ever use social media to instant message other people? How frequently?

d. Have you ever used dating websites? Please describe. _____

e. Have you ever used social media to meet new people? Please describe. _____

42. Do you belong to any civic, social, fraternal, union or professional organizations? _____

a. If so, please state which one(s): _____

Have you ever been a member of an organization that advocates for policy or laws related to gun possession?

If so, please state which one(s): _____

43. Have you, a family member, or a friend ever worked or volunteered for organizations related to sex-crime victims or crime victims under the age of eighteen?

a. If so, please state which one(s): _____

44. The judge will instruct you that a defendant in the criminal case has a constitutional right not to testify, and that no presumption of guilt may be raised, and no inference of any kind may be drawn, from the fact that defendant did not testify. Can you follow that instruction?

45. The Court will instruct you as to the laws to be applied in this case. Would you be unwilling or unable to follow the court's instructions as to the law, regardless of what you think the law is, or ought to be?

46. The lawyers have estimated that the trial of this case might take three to five months. Is there any reason that you would not be able to sit as a juror for that length of time?

47. Is there anything you have not indicated in the above answers which you think might affect your ability to serve as a juror in this case? (Please explain.)

This image shows a single sheet of white paper with horizontal blue ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.